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JUN 12 2003

June 12, 2003

Water Docket

Environmental Protection Agency

Mail Code 4101 T

1200 Pennsylvania Ave., NW

Washington, DC 20460

Attention Docket ID No. OW-2002-0051

Re: Attention Docket ID No. OW-2002-0051, Agency ICR Activities,
Comment Request Drinking Water Regulations Compliance and Cost
Retrospective Survey

Dear Docket:

The Association of Metropolitan Water Agencies (AMWA) appreciates the opportunity to comment on the EPA's ICR Activities for Drinking Water Regulations Compliance and Cost Retrospective Survey published in the April 14th *Federal Register* (68 FR 17937). As directors and managers of the nation's largest drinking water systems collectively serving over 110 million people, AMWA members have spent and will spend considerable funds to comply with rules promulgated as a result of the 1996 SDWA amendments and are very interested in assisting EPA to make accurate cost estimates.

AMWA has several questions and suggestions with respect to this survey.

1. EPA needs to be clear in its objectives for this survey, outlining them up-front.
2. In order to develop a survey that will provide, fair, accurate and useful information about the estimation of costs resulting from compliance decisions, EPA must take care in how questions are asked in the survey. The survey design and questions asked will be critical to ensure that the responses are clear, unambiguous and useful.

For example, it is important for EPA to ask questions that would seek to understand how costs are captured by those systems who have undertaken major construction projects based on multiple regulations at once, or based on where they understand future regulations are going.

3. AMWA would like to offer EPA assistance in the development and testing of the survey questions. AMWA believes that EPA may receive a better response to its survey, specifically from the larger utilities, if it was supported jointly by EPA and AMWA.

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4. AMWA has assisted EPA in the past with the collection of large system data for use in developing cost estimates for regulations. AMWA believes that a critical look at compliance costs is an essential part of validating economic analyses performed and is therefore a useful and proper joint undertaking for the Agency.

5. In response to EPA's inquiry as to the accuracy of its estimate of the burden of the proposed collection of information including the validity of the methodology and assumptions used (Sec. II. li, p. 17939), AMWA believes it will be very difficult to obtain a representative and statistically significant sample. Therefore, EPA should consider working jointly with AMWA to ensure as many responses as possible.

Please do not hesitate to contact me or Erica Michaels on AMWA's staff at the number above or via email at: michaels@amwa.net if you would like to further discuss any of these comments.

Sincerely,



Diane VanDe Hei
Executive Director

Cc: Cynthia Dougherty, EPA OGWDW
John Bennett, EPA OGWDW
Jim Laity, OMB OIRA